UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PDV USA, Inc.	
Plaintiff,	
v.	No. 20-cv-03699-JGK
Interamerican Consulting, Inc.	
Defendant.	

DECLARATION OF DAVID RIVERA

I, David Rivera, declare as follows:

1. I am the President of Interamerican Consulting, Inc. ("Interamerican"), the defendant in *PDV USA, Inc. v. Interamerican Consulting, Inc.*, No. 20-cv-3699-JGK, currently pending in the United States District Court for the Southern District of New York.

2. The following facts are based on my own personal knowledge. If called as a witness I would and could competently testify as follows.

3. Attached hereto as Exhibit A is a true and correct copy of an email in Spanish that I received on May 31, 2017, from Arnaldo Arcay, Legal Advisor – International Affairs at Citgo Petroleum Corporation ("CITGO"), together with a certified English translation of the same.

4. Attached hereto as Exhibit B is a true and correct copy of an email in Spanish that I received on October 5, 2017, from Arnaldo Arcay, Legal Advisor – International Affairs at CITGO, together with a certified English translation of the same.

5. Attached hereto as Exhibit C is a true and correct copy of an email I received on December 28, 2018, from Alejandro Escarrá, Vice President, Legal Affairs at CITGO.

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6. Attached hereto as Exhibit D is a true and correct copy of an email I received on February 18, 2019, from Judith Colbert, General Counsel at CITGO.

7. My initial discussions concerning the consulting agreement at issue in this case were with representatives of CITGO. It was at their unsolicited initiative that Interamerican agreed to a consulting agreement with PDV USA, Inc. The consulting agreement was drafted and presented to Interamerican by corporate executives of CITGO, and was sent from a lawyer at CITGO using an email address at CITGO.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 18 2020, in ___Miami, Florida___

_____
David Rivera